

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of an Investigation into the)	
Natural Gas Incident in Boonville,)	
Missouri, on the System Operated by)	Case No. GS-2006-
AmerenUE.)	

MOTION TO ESTABLISH A CASE

COMES NOW the Staff of the Public Service Commission of Missouri, and for its Motion to Establish a Case, states:

1. The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers, and the public served by municipal natural gas systems under Section 386.310, RSMo 2000. This section grants the Commission authority to issue orders after hearing to promote and safeguard employee, customer, and public safety.
2. AmerenUE provides natural gas service in Boonville, Missouri. On October 10, 2005, a reportable natural gas incident occurred in Boonville on the AmerenUE system. No injuries or fatalities were reported, but property damage occurred at several customer premises.
3. Staff's preliminary investigations indicate that during work on the natural gas system in Boonville, high-pressure gas entered the low-pressure system and caused an over-pressure condition. The low-pressure system normally operates at the equipment utilization pressure and no service regulators are used at the customer meters. The over-pressure condition resulted in property damage for several customers connected to the low-pressure system. This property damage involved severe fire damage to the home at 1312 Fourth Street, fire damage

near a few customers' furnaces, and damage to some furnace control valves. As a result of the customer damage caused by this reportable incident, the Staff recommends that the Commission open a case for the purpose of receiving the Gas Incident Report that results from Staff's formal investigation of this incident in Boonville.

WHEREFORE, the Staff asks the Commission to open a case for the investigation of the gas incident that occurred in Boonville, Missouri on October 10, 2005.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Robert S. Berlin

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record as shown on the attached service list this 4th day November 2005.

/s/ Robert S. Berlin